

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
Nashville Division**

L.W., by and through her parents and next friends, Samantha Williams and Brian Williams, *et al.*,

*Plaintiffs,*

v.

JONATHAN SKRMETTI, in his official capacity as the Tennessee Attorney General and Reporter, *et al.*,

*Defendants.*

**Civil No. 3:23-cv-00376**

**MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to Rule 83.01(b) of the Local Rules of this Court, Stella Yarbrough, a member of the bar of this Court, hereby moves for the admission *pro hac vice* of Theodore James Salwen, an attorney with the law firm of Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036, 212.872.1000, jsalwen@akingump.com, for the purposes of this litigation in this Court as counsel for plaintiffs.

1. Theodore James Salwen does not reside in this district and does not maintain an office in this district for the practice of law.

2. Theodore James Salwen is a member in good standing of the United States District Court for the Southern District of New York. A certificate of good standing and sworn statement regarding disciplinary, contempt, and criminal proceedings are attached, and the filing fee in the amount of \$150.00 has been paid to the Clerk via the Court's electronic payment system.

Dated: April 26, 2023

Respectfully submitted,

/s/ Stella Yarbrough

Stella Yarbrough, BPR No. 033637

ACLU Foundation of Tennessee

P.O. Box 120160

Nashville, TN 37212

Tel.: 615-320-7142

syarbrough@aclu-tn.org

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**DECLARATION OF THEODORE JAMES SALWEN**

1. I hereby certify that I am a member in good standing of the bar of the United States District Court for the Southern District of New York. A true and correct copy of my Certificate of Good Standing is included with the motion for my admission *pro hac vice*.
2. I also declare under penalty of perjury that I am not, nor have I ever been, the subject of criminal proceedings nor disciplinary proceedings by any disciplinary authority, nor have I had a finding of contempt or a sanction against me under 28 U.S.C. § 1927.

/s/ Theodore James Salwen  
Theodore James Salwen

AKIN GUMP STRAUSS HAUSER & FELD LLP  
One Bryant Park  
New York, NY 10036  
Telephone: (212) 872-1000  
Facsimile: (212) 872-1002  
Email: jsalwen@akingump.com

**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that on April 26, 2023, a true and correct copy of the foregoing has been served on all defendants via certified mail to the Tennessee Attorney General at the following address:

500 Dr MLK Jr Blvd  
Nashville, TN 37219

/s/ Stella Yarbrough  
Stella Yarbrough BPR No. 033637  
American Civil Liberties Union  
Foundation of Tennessee  
P.O. Box 120160  
Nashville, TN 37212  
Tel: (615) 320-7142  
syarbrough@aclu-tn.org

*Attorney for Plaintiffs*